

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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BUREAU OF AIR REGULATION

IN RE:
FLORIDA POWER & LIGHT CO.
MARTIN COUNTY, FLORIDA

DRAFT PERMIT NO. 0850001-010-AC (PSD-FL-327)
OGC CASE NO. _____

REQUEST FOR ENLARGEMENT OF TIME

FLORIDA POWER & LIGHT CO. ("FPL"), by and through undersigned counsel, and pursuant to Florida Administrative Code Rule 62-110.106(4), hereby requests an enlargement of time, to and including October 13, 2002, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPL states:

1. On or about July 30, 2002, FPL received from the Department of Environmental Protection ("Department") an "Intent to Issue PSD Permit" and accompanying "Draft Permit," "Technical Evaluation and Preliminary Determination" and "Draft BACT Determination" regarding a new combined cycle generating unit (Unit 8) to be located at FPL's Martin Power Plant in Martin County, Florida. The "Intent to Issue" advised that FPL has fourteen days from receipt in which to file a Petition for Administrative Proceedings on the Department's proposed action.

2. Based on FPL's initial review, the Draft Permit and related documents raise issues and contain provisions that may warrant clarification or correction. Additional time is needed to fully review these documents and to discuss these issues and provisions with Department staff. FPL intends to send a letter to the Department providing its comments on the Draft Permit in the near future.

3. Accordingly, FPL requests an extension of time through and until October 13, 2002, in which to file a Petition for Administrative Proceedings on the Department's proposed action pursuant

to Sections 120.569 and 120.57, Florida Statutes, and Rule 62-110.106(4), Florida Administrative Code.

4. This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the Draft Permit in the event a mutually agreeable resolution of the issues cannot be reached. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to initiate formal administrative proceedings in this matter.

WHEREFORE, Florida Power & Light Co. respectfully requests that the time for filing of a Petition for Administrative Proceedings regarding the Department's Intent to Issue the above-referenced PSD Permit be formally extended to and including October 13, 2002. If the Department denies this Request, FPL respectfully requests an opportunity to file a Petition for Administrative Proceedings within ten days of such denial.

Respectfully submitted this 13TH day of August, 2002.

HOPPING GREEN & SAMS, P.A.

By: 

Peter C. Cunningham
Florida Bar No. 0321907
Post Office Box 6526
Tallahassee, FL 32314
850-222-7500

Attorneys for FLORIDA POWER & LIGHT CO.

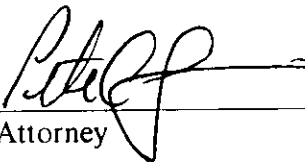
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 13TH day of August, 2002:

Jeff Koerner
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

W. Douglas Beason
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Attorney



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

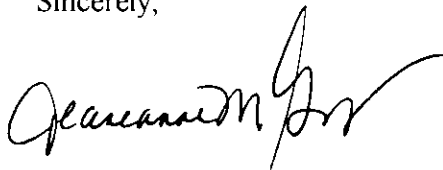
Thank you for sending the prevention of significant deterioration preliminary determination (PSD) and draft permit for a proposed modification of the Florida Power & Light Martin Power Plant in Martin County, Florida (Air Permit No. PSD-FL-327). The project involves addition of two combined cycle combustion turbines and associated heat recovery steam generators with supplemental duct firing, a common steam-electrical generator, and other associated support equipment.

Our only comment concerns the best available control technology evaluation for nitrogen oxides (NO_x) emissions when the combustion turbines are operating in simple cycle mode. The applicant's NO_x best available control technology (BACT) evaluation for simple cycle operation only took into account the option of high-temperature (hot) selective catalytic reduction (SCR) control. Likewise, the BACT determination by the Florida Department of Environmental Protection (FDEP) also appears to have taken only hot SCR into consideration for simple cycle operation. Another option is also theoretically possible as discussed below. We request that FDEP evaluate the technical feasibility of this option and, if technically feasible, the economics, environmental impacts, and energy use aspects of this option.

The other option takes advantage of the fact that a conventional SCR system (lower temperature SCR) will be in place to control NO_x emissions during combined cycle operation. Therefore, an additional option for simple cycle NO_x emissions control would be to reduce the temperature of the exhaust gases from a combustion turbine in simple cycle mode and route the reduced-temperature exhaust gases to the conventional SCR system. One method (although not the only method) for reducing temperature in such circumstances is to inject ambient air into the exhaust gases from a combustion turbine operating in simple cycle mode. If this option is technically feasible, evaluating the cost of the option should discount any costs that would otherwise be incurred for the conventional SCR system used to control combined cycle NO_x emissions.

If you have any questions regarding this letter, please call César Zapata at (404) 562-9139.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeaneanne M. Gettle". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeaneanne M. Gettle
Acting Chief
Air Permits Section

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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DEC 10 2002

BUREAU OF AIR REGULATION

IN RE:
FLORIDA POWER & LIGHT CO.
MARTIN COUNTY, FLORIDA

DRAFT PERMIT NO. 0850001-010-AC (PSD-FL-327)
OGC CASE NO. 02-1209

REQUEST FOR ADDITIONAL ENLARGEMENT OF TIME

FLORIDA POWER & LIGHT CO. ("FPL"), by and through undersigned counsel, and pursuant to Florida Administrative Code Rule 62-110.106(4), hereby requests an additional enlargement of time, to and including February 10, 2003, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPL states:

1. On or about July 30, 2002, FPL received from the Department of Environmental Protection ("Department") an "Intent to Issue PSD Permit" and accompanying "Draft Permit," "Technical Evaluation and Preliminary Determination" and "Draft BACT Determination" regarding a new combined cycle generating unit (Unit 8) to be located at FPL's Martin Power Plant in Martin County, Florida.

2. Based on FPL's initial review, the Draft Permit and related documents raised issues and contained provisions that may warrant clarification or correction. FPL's request for an extension of time until October 13, 2002, to file a Petition for Administrative Proceedings regarding the Department's proposed action on the referenced PSD Permit was granted by order of the Department dated September 11, 2002. A second request for extension of time until December 9, 2002 was granted by order of the Department dated October 24, 2002.

3. Representatives of FPL have met and corresponded with staff of the Department's Bureau of Air Regulation regarding the PSD Permit for Unit 8. It appears that most, if not all, issues

will be resolved through these ongoing discussions.

4. Accordingly, FPL requests an additional extension of time, through and until February 6, 2003, in which to file a Petition for Administrative Proceedings on the Department's proposed action pursuant to Sections 120.569 and 120.57, Florida Statutes, and Rule 62-110.106(4), Florida Administrative Code.

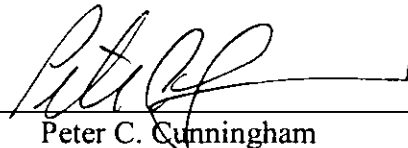
5. This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the Draft Permit in the event a mutually agreeable resolution of the issues cannot be reached. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to initiate formal administrative proceedings in this matter.

WHEREFORE, Florida Power & Light Co. respectfully requests that the time for filing of a Petition for Administrative Proceedings regarding the Department's Intent to Issue the above-referenced PSD Permit be formally extended to and including February 10, 2003. If the Department denies this Request, FPL respectfully requests an opportunity to file a Petition for Administrative Proceedings within ten days of such denial.

Respectfully submitted this 9TH day of December, 2002.

HOPPING GREEN & SAMS, P.A.

By: _____


Peter C. Cunningham
Florida Bar No. 0321907
Post Office Box 6526
Tallahassee, FL 32314
850-222-7500

Attorneys for FLORIDA POWER & LIGHT CO.

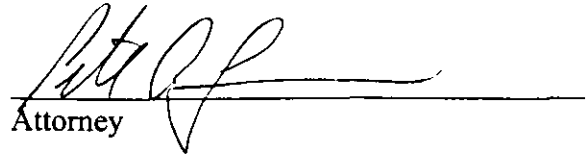
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Mail on this 9th day of December, 2002:

Jeff Koerner
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS 5505
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W. Douglas Beason
Department of Environmental Protection
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Attorney